

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No.

19-34574-KRH

Chapter 7

NOTICE OF MOTION AND HEARING THEREON IF NECESSARY

PLEASE TAKE NOTICE that Lynn L. Tavenner, Chapter 7 Trustee (the “**Trustee**”), and not individually but solely in her capacity as the Chapter 7 trustee of LeClairRyan PLLC, in the above-referenced Chapter 7 case (the “**Case**”), by counsel, has filed the following in the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) the following: MOTION FOR (I) APPROVAL OF COMPROMISE AND SETTLEMENT AND (II) REDUCED NOTICE PERIOD AND MEMORANDUM OF LAW (Gary D. LeClair). (the “**Motion**”). A copy of the Motion is being served herewith.

UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THE MOTION AND SUPPORTING MEMORANDUM IS FILED WITH THE CLERK OF COURT AND SERVED AS DIRECTED BELOW BY JUNE 14, 2025, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE MOTION AS CONCEDED.

A HEARING TO CONSIDER THE RELIEF REQUESTED IS SCHEDULED FOR JUNE 17, 2025 at 1:00 P.M. (PREVAILING EASTERN TIME) AT THE U.S. BANKRUPTCY COURT, U.S. COURTHOUSE, 701 E. BROAD STREET, COURTROOM 5000, RICHMOND, VA 23219.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management and Administrative Procedures [ECF. No.

¹ The principal address of the Debtor as of the Petition Date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to pberan@tb-lawfirm.com or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then as indicated previously, by **June 14, 2025** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(G) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat all as conceded and enter appropriate orders granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection(s) on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection(s) is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT if an Objection is timely filed, the Court will entertain the Motion on **June 17, 2025, at 1:00 p.m.** (or such time thereafter as the matter may be heard) at the U.S. Bankruptcy Court, U.S. Courthouse, 701 E. Broad Street, Courtroom 5000, Richmond, VA 23219.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: May 28, 2025

By: /s/ Paula S. Beran

Richmond, Virginia

Paula S. Beran, Esquire (VSB No. 34679)
Tavenner & Beran, PLC
20 North 8th Street
Richmond, Virginia 23219
Telephone: (804) 783-8300
pberan@tb-lawfirm.com

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and/or the Case Management Order, I certify that on May 28, 2025, a true copy of the foregoing Notice was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee (b) the Core Parties and 2002 List as defined in the Case Management Order, (c) Persons listed on the ESH List, and (d) all parties that properly filed a request for notice of papers in this case pursuant to Bankruptcy Rule 2002 (all as listed on Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran
Counsel for Lynn L. Tavenner, Chapter 7 Trustee